

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

----- X
ANDIN INTERNATIONAL, INC.

Plaintiff,

- against -

YURMAN STUDIO, INC.

Defendant.

Civil Action No. 08 cv 1159 (HB)

**NOTICE OF MOTION FOR
A DEFAULT JUDGMENT**

----- X
YURMAN STUDIO, INC.

Defendant-
Counterclaimant,

- against -

ANDIN INTERNATIONAL, INC. and
VARDI GEM LUSTRE, LLC

Counterclaim-
Crossclaim Defendants.

----- X

PLEASE TAKE NOTICE that upon the attached Declaration of Marla Eisland Sprie, Crossclaim-Plaintiff Yurman Studio, Inc., will move this Court at the United States District Courthouse, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Room 23B, New York, New York 10007, before the Honorable Harold Baer, for an Order granting a judgment of default against Crossclaim-Defendant Vardi Gem Lustre, LLC pursuant to Federal Rule of Civil Procedure 55.

PLEASE TAKE FURTHER NOTICE that answering papers, if any, shall be served and filed no later than ten business days after service of these motion papers.

Dated: New York, New York
July 10, 2008

ARNOLD & PORTER LLP

By: Mark Sprie
Louis S. Ederer
Marla Eisland Sprie
John Maltbie
399 Park Avenue
New York, NY 10022
(212) 715-1000
Louis.Ederer@aporter.com
Marla.Sprie@aporter.com
John.Maltbie@aporter.com

Attorneys for Defendant-
Counterclaimant Yurman Studio, Inc.

TO:

Vardi Gem Lustre, LLC
31-00 47th Avenue #2
Long Island City, New York 11101

Vardi Gem Lustre, LLC
c/o Berkman, Henoch, Peterson & Peddy, P.C.
100 Garden City Plaza
Garden City, New York 11530

Oren J. Warshavsky, Esq.
Baker & Hostetler LLP
45 Rockefeller Plaza
New York, New York 10111
(212) 589-4200
Oren.Warshavsky@bakerlaw.com

Attorneys for Plaintiff-Counterclaim
Defendant Andin International, Inc.

CERTIFICATE OF SERVICE

I caused to be served a true and correct copy of the attached Notice of Motion for a Default Judgment upon the following by U.S. First Class Mail, this 10th day of July, 2008:

TO:

Vardi Gem Lustre, LLC
31-00 47th Avenue #2
Long Island City, New York 11101

Vardi Gem Lustre, LLC
c/o Berkman, Henoch, Peterson & Peddy, P.C.
100 Garden City Plaza
Garden City, New York 11530

Oren J. Warshavsky, Esq.
Baker & Hostetler LLP
45 Rockefeller Plaza
New York, New York 10111
(212) 589-4200
Oren.Warshavsky@bakerlaw.com

Attorneys for Plaintiff-Counterclaim
Defendant Andin International, Inc.



Anthony Boccanfuso